A subsidiary of Occidental Petroleum Corporation

5005 LBJ Freeway, Dallas, TX 75244-6119 P. O. Box 809050, Dallas, TX 75380-9050 Phone 972 404 3564 Fax 972 404 3287 steve\_kemp@oxy.com

201-16521

Stephen B. Kemp

Vice President Health, Environment, Safety & Security

Certified - Return Receipt Requested

December 20, 2006

The Honorable Stephen L. Johnson Administrator, U.S. Environmental Protection Agency 1200 Pennsylvania NW Ariel Rios Building Washington, DC 20460

CHAPTOSTHE ENDOUGHE SECRETARIAT

ATTN: Chemical Right-to-Know Program Dechlorane Plus® (CAS# 13560-89-9)

Dear Mr. Johnson:

Occidental Chemical Company (OxyChem), has reviewed EPA's comments on the test plan and robust summaries for Dechlorane Plus® (1,2,3,4,7,8,9,10,13,13,14,14-dodecachloro -1,4,4a,5,6,6a,7,10,10a,11,12,12a-dodecahydro-1,4:7,10-dimethanodibenzo[a,e]cyclooctene, CAS No. 13560-89-9). In response to those comments, OxyChem is preparing to undertake a repeat dose toxicity and reproduction/developmental toxicity screening study based on the OECD 422 Guideline. The protocol for this study is attached for EPA review and comment.

Please provide comments regarding the protocol to us within 90 days. If we do not receive comments from you within that time period, we intend to initiate testing as soon as the laboratory can accommodate this work. If you need further information or have questions, please contact Debbie Schober at (972) 404-4969.

Sincerely,

Attachment